

Title: Consultation on Proposed Licensing Schemes for Houses in Multiple Occupation (HMOs) and the other Private Rented Sector Housing | Ref: iDec-691225715 | Submitted: 10/03/2025

i-Decision

Introduction	
Type of request	EQHIA
Title	Consultation on Proposed Licensing Schemes for Houses in Multiple Occupation (HMOs) and the other Private Rented Sector Housing
Directorate	Places
Project Manager/Responsible Officer	Michelle Hammond
Project Manager/Responsible Officer Email	Michelle.Hammond@haverling.gov.uk
Conducted on	10/03/2025
Name	Anand Punj
Email	anand.punj@haverling.gov.uk

EQHIA	
Type of activity	Project
Manager name	Helen Oakerbee
Manager job title	Director of Planning & Public Protection, Planning & Public Protection
Manager service/directorate	Planning & Public Protection
Have you sought advice from the Corporate Policy & Diversity team and/or Public Health team	No

Reason for EQHIA	Changing, introducing a new, or removing a service, policy strategy or function, Does the activity have the potential to impact (either positively or negatively upon any factors which determine people's health and wellbeing
There is impact on age	<p>The number of people that live in Havering has increased over the last decade from 237,232 in 2011 to 262,052 in 2021. This is a 10.5% increase compared to a 7.7% increase across London and a 6.6% increase across England.</p> <p>The number of children aged under 18 has seen an increase of 15.2% (from 50,827 to 58,550), greatly outpacing the 4.8% and 3.9% increases in London and England, respectively. Havering now has a higher proportion of children aged 0-17 (22.3%) than 80% of local authorities in England. This increase is slightly lower than the latest ONS projections (2018). The ONS predicts that the 0-17 population will grow to 61,350 by 2031. Furthermore, Havering still has one of the highest proportions of older people aged 65+ in London (second after Bromley). The combined impact of having both a large older population and now a large (and growing) young population is that Havering now has the lowest proportion of working-age adults in London.</p> <p>The 2021 census data indicates one and two person households are most common in Havering. Based on tenure modelling (2024), Havering's PRS is now calculated to be 19.3% of all housing stock. The 2021 Census reports the PRS in Havering to be 15.9% and 11.5% in 2011. Tenure percentage change over the last two decades in Havering has been in line with the national trend the gradual PRS increase is part of a long term nationwide and regional trend.</p> <p>Housing and the quality of housing has a major impact on health and wellbeing of all age groups. Investment in improving poor, overcrowded or inappropriate housing will improve the quality of life of residents and have a preventative effect on future health and social care need. By driving up standards, licensing in the long term can deliver better individual health outcomes. It will also have a positive impact on older people who are often more susceptible to hazards such as excess cold and falls. Licensing in general affords tenants better protection from eviction as a landlord cannot evict a tenant if they have not licensed the property where required to.</p>

<p>There is an impact on disability</p>	<p>In Havering an estimated 38,449 residents reported having a disability in 2021. This is an age-standardised proportion (ASP) of 15.3%, which is slightly lower than London (15.6%) and lower than England (17.7%). In Havering, an ASP of 6.6% reported that their day-to-day activities were limited a lot and 8.7% reported their day-to-day activities were limited a little, due to a disability (see figure 4 below).</p> <p>29,742 households in Havering had at least one person with a disability. Of these households, 6,181 had two or more members with a disability.</p> <p>Selective and Additional licensing are unable to take into consideration a tenant's disability or needs associated with their disability when applying standards. The effect of licensing overall however would be positive for households with disabled occupants in improving overall housing conditions.</p> <p>It is also expected that positive impacts will be realised by our officers adopting a whole person approach, with the ability to identify any concerns and make referrals to partners. Particularly for our more isolated private renters, selective licensing will provide points of contact with landlords and the council for advice and support.</p>
<p>There is an impact on sex</p>	<p>Havering has 135,668 females (52%) and 126,384 males (48%) in the borough. 93.67% of Havering residents identify as the same gender as when they were born.</p> <p>Evidence suggests that Houses in Multiple Occupation are twice as likely to be occupied by males, predominantly under the age of 30, as shared accommodation is often the only type of affordable accommodation available to them and they usually have no access to social housing accommodation.</p> <p>The tenure intelligence reports indicates the Total HMO population: 864 (410 licensed HMOs; 454 predicted shared amenity HMOs. 426 HMOs are predicted to have serious hazards, affecting all wards. Analysis shows that 426 of 864 shared amenities HMOs (known and predicted) in Havering are predicted to have at least one serious hazard. The number of Category 1 and high scoring Category 2, (HHSRS A-D) hazards is highest in Rush Green & Crowlands. All wards have HMOs with predicted hazards.</p> <p>Housing and the quality of housing has a major impact on health and wellbeing of all people irrespective of gender. Investment in improving poor, overcrowded or inappropriate housing will improve the quality of life of residents and have a preventative effect on future health and social care need.</p> <p>No differential impact has been identified on the grounds of this protected characteristic in respect of landlords who may be affected by the licensing proposals as it applies equally to all landlords operating in Havering irrespective of sex / gender.</p>

<p>There is an impact on ethnicity</p>	<p>Havering is becoming more diverse. In 2021, White British remains the most common ethnic group in Havering, with 66.5% (174,232) of the population, down from 83.3% (197,615) in 2011. The next most common ethnic group is Asian, accounting for 10.7% (28,150) of the population, up from 4.9% (11,545) in 2011.</p> <p>In 2021, 87.8% (230,091) of usual Havering residents identified with at least one UK national identity (English, Welsh, Scottish, Northern Irish, British and Cornish). This is a decrease from 93.6% (222,066) in 2011. The figure for London in 2021 is 73.1% and England 90.3%. People who identified with at least one UK and one non-UK identity accounted for 1.8% (4,843) of the Havering population in 2021; this is an increase from 0.7% (1,680) in 2011. Those selecting a non-UK identity only accounted for 10.3% (27,118) of the Havering population in 2021, which is an increase from 5.7% (13,486) in 2011. Among those who described a non-UK national identity, the most common response was those describing “Romanian” as their national identity 2.0% (5,346) up from 0.2% (434) in 2011. The most common responses in 2011 were Irish 0.9% (2,037) and Lithuanian 0.5% (1,147).</p> <p>90.1% of residents aged 3 and over describe their main language as English, next main languages Romanian 2.3% and Lithuanian 0.9%. 4.8% of households have no members where their main language is English.</p> <p>Census data (2021), relating to Ethnic group and tenure indicates: 62% of PRS tenants are White, 10% Asian, 14% Black, 3% Mixed, 3% Other. The proposed designations apply equally to all tenants regardless of ethnicity/race.</p> <p>Housing and the quality of housing has a major impact on health and wellbeing of all people irrespective of ethnicity/race. Investment in improving poor, overcrowded or inappropriate housing will improve the quality of life of residents and have a preventative effect on future health and social care need.</p> <p>The planned property inspection programme will also allow provide those groups who are new entrants into the country, and may not be fully aware of their rights, better access to the Local Authority’s Private Sector Housing function. It is also expected that positive impacts will be realised by our officers adopting a whole person approach, with the ability to identify any concerns and make referrals to partners.</p> <p>The PRS Landlord Licensing proposal applies equally to all landlords operating within the London Borough of Havering irrespective of ethnicity / race therefore this group will not be negatively affected. A range of measures will be implemented in order to support landlords to respond to reports of antisocial behavior and unsocial tenants.</p>
----------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>There is an impact on religion/faith</p>	<p>The religion question is voluntary in the Census, but 94.5% of usual residents answered the question in 2021. The most commonly reported religion in Havering is Christian, with 52.2% of the total population in 2021 describing themselves as Christian. This is a reduction from 65.6% in 2011. No religion was the second most common response, with 30.6% identifying in this category, up from 22.6% in 2011. Other religions accounted for 11.7% of the total Havering population, which is an increase from 5.1% in 2011.</p> <p>Census data does not further breakdown the PRS tenure data into specific religious/faith groups, so it is difficult to assess the impact. Housing and the quality of housing has a major impact on health and wellbeing of all people irrespective of religion/faith Investment in improving poor, overcrowded or inappropriate housing will improve the quality of life of residents and have a preventative effect on future health and social care need.</p> <p>The PRS Landlord Licensing proposal applies equally to all landlords operating within the London Borough of Havering irrespective of religion/ faith therefore this group will not be negatively affected.</p>
<p>There is an impact on sexual orientation</p>	<p>The Census question on sexual orientation was a voluntary question asked of those aged 16 years and over. The number of people responding was very high with 93% (195,099) of Havering residents answering the question. In total, 91.07% (191,007) of Havering residents identified as straight or heterosexual. In total, 1.95% (4,092) Havering residents identified as one of the LGB+ orientations ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"). In total, 6.98% (14,631) Havering residents did not answer the question.</p> <p>The PRS Landlord Licensing proposal applies equally to all landlords and tenants operating or living within the London Borough of Havering irrespective of sexual orientation, and therefore this group will not be negatively affected. There is likely to be no disproportional impact.</p>

<p>There is an impact on marriage/civil partnership</p>	<p>The most recent Census data (2021), indicates 46% of respondents were either married or living in a civil partnership couple/household within the London Borough of Havering. This is the largest household type, with one person household accounting for 26% of respondents, 14% - lone parent households, 12% - cohabiting couple, and 2% - multi-person household.</p> <p>The PRS Landlord Licensing proposal applies equally to all landlords and tenants operating or living within the London Borough of Havering irrespective of their household type, and therefore this group will not be negatively affected. There is not likely to be a disproportionate effect on this group. Improving private rented housing conditions is likely to have a positive impact on all tenants, including those with dependents.</p> <p>Housing and the quality of housing has a major impact on health and wellbeing of all people irrespective of the household type. Investment in improving poor, overcrowded or inappropriate housing will improve the quality of life of residents and have a preventative effect on future health and social care need.</p>
<p>There is an impact on pregnancy, maternity and paternity</p>	<p>Proposed restrictions on numbers of occupants in rental accommodation may impact upon pregnant tenants as the addition of a baby may result in a property becoming overcrowded. However a landlord is NOT required to evict a tenant where the property has become 'naturally' overcrowded.</p> <p>Tenants are afforded more protections under licensing schemes. Housing advice will be available to any tenant that has been displaced as a consequence of licensing and in many cases tenants falling within this protected characteristic will be owed a homeless duty by the council's housing service.</p>
<p>There is an impact on socio-economic</p>	<p>Labour Market, Industry, Occupation, and Travel to Work data states 59.5% of residents in Havering have a job, an increase from 58.9% in 2011. 3.6% of residents are unemployed, which is the fourth lowest rate in London but an improvement from the rate of 5.0% in 2011. 21.0% of residents are retired - the highest rate in London, which is in line with or high older person population.</p> <p>Havering ranks as the 179 (rank of average rank) most deprived borough in England out of 317. Havering has a mixture of high and low deprivation wards. 4 of 20 wards have aggregated IMD rankings below decile 5 (national average)</p> <p>Private Renters on low income are likely to be positively impacted where poor energy efficiency and energy costs are impacting disposable income through improvements in housing standards.</p> <p>The impact of the license fee on both landlords and tenants is likely to be minimal as a license lasts 5 years. Any perceived negative impact is likely to be outweighed by improvements to housing and management standards.</p>

<p>There is an impact on gender</p>	<p>Gender identity refers to a person's sense of their own gender, whether male, female or another category such as non-binary.</p> <p>In London Borough of Havering 0.25% (528) of people do not identify with the same sex registered as their birth. This is lower than the London figure of 0.91% and lower than the England figure of 0.55%.</p> <p>For the first time, the 2021 Census included questions relating to sexual orientation and also whether a person is transgender. However, the transgender question appears have been poorly understood. With a very high number of people whose first language is not English reporting that they were transgender</p> <p>On 5 September 2024, Emma Rourke, Deputy National Statistician, wrote to Ed Humpherson, Head of the Office for Statistics Regulation (OSR), to request that the gender identity estimates from Census 2021 are no longer accredited official statistics and are classified as official statistics in development. The change in designation was confirmed by OSR on 12 September 2024. To reflect this change in designation, the accredited official statistics logo has been removed from this bulletin.</p> <p>There is likely to be no disproportional impact to landlord or tenants irrespective of their gender identity.</p>
<p>There is an impact on health</p>	<p>In Havering an estimated 219,777 residents had 'good' or 'very good' health in 2021. This is an age standardised proportion (ASP) of 83.0%, which is higher than London (81.9%) and England (81.7%). However, in Havering, an ASP of 48.2% residents had 'very good' health compared to 49% in London.</p> <p>22.78% of those residents who completed the ONS annual population survey in 2020/21 self-reported their wellbeing as high anxiety</p> <p>Licensing can assist in improving the condition/quality of rental accommodation, by improving management and responsiveness of property owners. This will likely have a positive impact on a tenant's mental health and wellbeing.</p> <p>It is also expected that positive impacts will be realised by our officers adopting a whole person approach, with the ability to identify any concerns and make referrals to internal partners such as social care services.</p>

There is an impact on social cohesion	<p>Property licensing allows the Local Authority to easily identify, and communicate with owners of PRS properties, improving intergroup cooperation. The imposition of licensing conditions on owners of properties further incentivises cooperation between all parties for the betterment of the common good.</p> <p>Property licensing can assist in improving the condition/quality of rental accommodation, along with improving management and responsiveness of property owners. This can improve a tenant's confidence in political institutions, and their perception of fairness, thereby positively impacting their social trust levels.</p> <p>Compliant landlords are likely to negatively view property licensing, considering it over bearing, and unnecessary. However, it provides the Local Authority the tools to target the worst landlords, and drive them out of the market through formal enforcement actions.</p> <p>By monitoring incoming consultation responses the Local Authority can determine whether/if mitigating actions are required.</p>
How frequently will the EQHIA be reviewed	A reveiw will take place once the consultation process has been undertaken.
Scheduled date of review	01/08/2025
Lead officer conducting the review	Michelle Hammond